IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE (Wilmington)

MONEYCAT LTD,	:	**CIVIL ACTION**
Plaintiff,	:	
v.	:	**NO. 1:13-1358**
PAYPAL INC.,	:	
Defendant.	:	

SCHEDULING ORDER

AND NOW, this 25th day of November, 2013, following a preliminary pretrial conference, it is **ORDERED** that:

1. This case is referred to Magistrate Judge David R. Strawbridge for settlement purposes. Judge Strawbridge will contact counsel to initiate the settlement process.

2. All motions to amend the complaint and to join or add additional parties shall be filed by **June 4, 2014**, including any defense based on inequitable conduct.

3. All fact discovery shall be completed by **September 1, 2014**.

   a. The parties shall comply with Paragraph 4 of the Delaware Default Standard for Discovery relating to initial discovery in patent cases.

   b. Discovery of paper and electronic documents shall be substantially completed by **April 14, 2014**. The parties shall follow the Delaware Default Standard for Discovery of electronic documents, unless they agree or the Court orders otherwise.

c. The parties will be limited to 45 requests for admissions per side, and a maximum of 25 interrogatories, including contention interrogatories.

d. The parties will be limited to 10 non-expert depositions per side, of seven hours each, except that a named inventor on the patents-in-suit may be deposed for up to 14 hours. For good cause shown, the parties may seek an order from the Court permitting additional depositions.

4. All expert discovery, including all depositions of expert witnesses, shall be completed by **December 8, 2014**.

a. Expert reports on issues for which a party has the burden of proof are due by **September 29, 2014**.

b. Rebuttal expert reports are due by **October 27, 2014**.

c. Supplemental reports for any issues on which a party in rebuttal carried a burden of production are due by **November 10, 2014**.

5. Any party expecting to offer opinion testimony from lay witnesses pursuant to Federal Rule of Evidence 701 with respect to the issues of liability and/or damages shall, within the time required for the submission of expert discovery set forth above, serve opposing parties with concise details and/or documents covering the lay opinions of the Rule 701 witnesses, including the identity of each witness offering the lay opinion, the substance and the basis for each opinion.

6. All motions for summary judgment and *Daubert* motions shall be filed no later than **December 22, 2014**.

7. Responses to motions for summary judgment and *Daubert* motions, if any, shall be filed no later than **January 12, 2015**. Replies shall be filed no later than **January 26, 2015**.

8. A claim construction hearing shall be held on **June 23, 2014**.

   a. The number of claim terms to be construed shall be limited to ten.

   b. The parties shall exchange lists of those claim terms that the believe need construction and their proposed claim construction of those terms by **February 17, 2014**.

   c. The parties shall meet and confer to prepare a joint claim construction chart to be submitted on **March 17, 2014**, with the claim chart separately docketed.

   d. The parties shall contemporaneously file initial briefs on claim construction issues on April 21, 2014, along with a declaration from any expert that a party wishes to offer as extrinsic evidence and whom the party may call to testify at the claim construction hearing. Any such declaration must be sufficiently specific to permit a meaningful deposition of the expert and generally comply with the requirements for expert reports in Rule 26 of the Federal Rules of Civil Procedure. Any such expert must be made available for deposition between April 23, 2014 and May 7, 2014.

   e. Responsive briefs shall be contemporaneously filed on **May 21, 2014**, along with any rebuttal declarations from experts.

9. A further scheduling order will be issued after the Court rules on dispositive motions.

BY THE COURT:

/s/ Mitchell S. Goldberg

MITCHELL S. GOLDBERG, J.